EXHIBIT C

DECLARATION OF JAIDEEP VENKATESAN

Technology

Tesla Sues Ex-Optimus Engineer Alleging Theft of Robotic Trade Secrets



A Tesla Inc. Optimus robot at the Paris Motor Show in Paris, on Oct. 15. *Photographer: Nathan Laine/Bloomberg*

By Dana Hull

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<u>Tesla Inc.</u> sued a former engineer with the company's highly secretive Optimus program, accusing him of stealing confidential information about the humanoid robot and setting up a rival startup in Silicon Valley.

Zhongjie "Jay" Li worked at Tesla between August 2022 and September 2024, according to a complaint filed in a San Francisco Federal Court late on Wednesday. Li worked on "advanced robotic hand sensors—and was entrusted with some of the most sensitive technical data in the program," Tesla's

lawyers said in the complaint.

The suit, also filed against his company Proception Inc, alleges that in the weeks before his departure, Li downloaded Optimus-related files onto two personal smartphones and then formed his own firm.

"Less than a week after he left Tesla, Proception was incorporated," according to the complaint. "And within just five months, Proception publicly claimed to have 'successfully built' advanced humanoid robotic hands—hands that bear a striking resemblance to the designs Li worked on at Tesla."

Li, who lists himself as founder and CEO of Proception on LinkedIn, didn't respond to requests for comment sent outside of normal working hours on the platform. The company didn't immediately respond to an emailed message seeking comment or message sent through its website.

Attorneys for Li or the company weren't immediately visible in court filings

Making a hand that is as dexterous as a human one is one of the biggest challenges in robotics. Tesla intends for Optimus to perform several tasks, from working in the electric automaker's factories to handling every day tasks like grocery shopping and babysitting. On Tesla's earnings call in January, CEO Elon Musk said that Optimus has the most sophisticated hand ever made.

"My prediction long-term is that Optimus will be overwhelmingly the value of the company," he said.

An exhibit to the complaint includes an emailed reminder to the Optimus team from August 2024 that reminds staff that Tesla IT assets and networks are monitored and that "incidents of mishandling or suspected theft of Tesla property, including data and code, will be thoroughly investigated."

Li's "conduct is not only unlawful trade misappropriation – it also constitutes a calculated effort to exploit Tesla's investments, insights, and intellectual property for their own commercial gain," Tesla's lawyers said in the filing.

The case is <u>Tesla</u>, <u>Inc. v. Proception</u>, <u>Inc. et al</u>, <u>Docket No. 5:25-cv-04963 (N.D. Cal. Jun 11, 2025)</u>, Court Docket

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